

11/14/16
Clerk, U. S. District Court
Western District of Texas
By *[Signature]*
Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

V.

DAVID NGUYEN

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Criminal No.: SA16-MJ-1096

GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

The Government at this time moves the Court to hold the above-named Defendant without bond pursuant to 18 U.S.C. § 3142(e) and (f). This request is made for the following reasons:

1. The Defendant is charged by complaint for possession with intent to distribute a controlled substance, which offense involved over 200 grams or more of cocaine, in violation of Title 21 U.S.C. Sections 841(a)(1) and 841(b)(1)(B) and 924 (C)..

2. There are no conditions or combination of conditions which will reasonably assure the safety of the community or witnesses.

3. The defendant has multiple class c active warrants and the Government deems the defendant a serious risk of flight and is not convinced of the personal appearance of the Defendant at future court settings.

The Government moves for a ten-day continuance of the detention hearing from the date of the initial appearance, under 18 U.S.C. § 3142(d).

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

RICHARD L. DURBIN, JR.
ACTING UNITED STATES ATTORNEY

By: /s/
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